

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE: DEPUY ORTHOPAEDICS, INC.,)	MDL DOCKET NO.
PINNACLE HIP IMPLANT PRODUCTS)	3:11-MD-2244-K
LIABILITY LITIGATION)	Honorable Ed Kinkeade
-----)		
This Document Relates to:)	
)		
GERTIE F. CAMPBELL and)	
WILLIAM J.CAMPBELL,)	
)		
Plaintiffs,)	
VERSUS)	Case No. 3:11-CV-02957-K
)		
DEPUY ORTHOPAEDICS, INC.,)	
DEPUY, INC.,)	
JOHNSON & JOHNSON,)	
JOHNSON & JOHNSON SERVICES, INC.,)	
and)	
JOHNSON & JOHNSON INTERNATIONAL,)	
)		
Defendants.)	

**PLAINTIFFS, GERTIE F. CAMPBELL AND WILLIAM J. CAMPBELL'S,
MOTION TO UNSEAL SPECIAL MASTER STANTON'S MONTHLY REPORTS
FROM JUNE 1, 2022, THROUGH THE PRESENT**

Come the plaintiffs and move the Court to unseal and allow plaintiffs to obtain copies of Special Master Stanton's Monthly Reports from June 1, 2022,¹ through the present. These reports are held by the Court under seal.

The plaintiffs recognize that it may be necessary to redact portions of these monthly reports but the plaintiffs respectfully assert they should be allowed to obtain all entries relating to Special Master Stanton's comments regarding settlement efforts and strategies and all entries reflecting any *ex*

¹ June 1, 2022, is the date of this Court's announced decision to remand these cases for case-specific discovery and decisions.

parte communications with defense attorneys or with this Court that relate in any way to retention or non-retention by this Court over case-specific discovery and/or pretrial matters and all entries relating to the development and/or adoption of the Court's Scheduling Order dealing with case-specific discovery and other pretrial matters.

As demonstrated in plaintiffs' Brief, *ex parte* communications involving Special Master Stanton were prohibited under Canon 3(A)(4)(d), *Judicial Code of Conduct*. Plaintiffs have a need to discover whether such communications occurred for purposes of the Motion seeking recusal.

Plaintiffs rely on the Brief contemporaneously filed in support of the Motion to Recuse.

Certificate of Conference

Pursuant to *Local Rule 7.1*, plaintiffs' counsel Jon E. Jones conferred with defendants' counsel Molly E. Flynn on November 15, 2022, regarding this motion in an effort to obtain agreement, but agreement was not reached and this motion is filed as opposed.

Respectfully submitted,

LAW OFFICE OF JON E. JONES

By: /s/ Jon E. Jones
Jon E. Jones, BPR #2848
345 S. Jefferson Avenue, Suite 400
Cookeville, TN 38501
(931) 372-8771 – phone
(931) 372-8992 – fax

CALLAHAN & BINKLEY, PLC

By: /s/ Patrick Shea Callahan
Patrick Shea Callahan, BPR #29086
321 East Spring Street, Suite 304
Cookeville, TN 38501
(931) 650-3322 – phone
(931) 650-3964 – fax

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 15, 2022, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this action.

LAW OFFICE OF JON E. JONES

By: /s/ Jon E. Jones